

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:  
(202) 326-7999

July 30, 2024

*Via ECF*

The Honorable George B. Daniels  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1310  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)  
(All Actions)

Dear Judge Daniels:

Pursuant to this Court's July 29, 2024 Order (ECF No. 10173), Defendant Kingdom of Saudi Arabia ("Saudi Arabia") will file on the public docket this evening unredacted versions of its renewed motion to dismiss briefing as well as the supporting averments and exhibits.

These versions of Saudi Arabia's motion papers remove redactions to material that Saudi Arabia has produced in this litigation and to the testimony of Saudi Arabia's witnesses who were deposed in the litigation, except for the limited redactions to KSA Ex. 61, which the Court has ordered should remain redacted. *See* ECF No. 10173, at 14 n.12. These versions will also redact references to the Al Rajhi Bank exhibits and to the testimony of the four non-party witnesses discussed in note 4 of the July 29 Order. Pursuant to Federal Rule of Civil Procedure 5.2, these versions maintain redactions to personal identifying information.

The papers filed today will also maintain redactions to FBI materials that the FBI previously requested. To the extent the FBI has not yet had the opportunity to review Saudi Arabia's exhibits for redaction, those exhibits will not be publicly filed today. Saudi Arabia will propose to the FBI removing certain FBI redactions and unsealing certain FBI exhibits consistent with the Court's July 29 Order. However, it is necessary for the FBI to review those proposals before unredacted or unsealed versions appear on the public docket. Although, it is not practicable for this process to be completed before tomorrow's hearing, Saudi Arabia will endeavor to provide its proposals to the FBI as soon as possible.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable George B. Daniels  
July 30, 2024  
Page 2

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

Cc: All MDL Counsel of Record (via ECF)